

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**JANUARY 2020 GRAND JURY**  
**(Impaneled January 3, 2020)**

**THE UNITED STATES OF AMERICA**

**-vs-**

**INDICTMENT**

**RICHARD LAFRANCE**  
**a/k/a Anthony Ramos**

**Violations:**

Title 18, United States Code,  
Sections 2422(b), 2251(a), 2251(e), and  
2260A  
(3 Counts)

**COUNT 1**  
**(Enticement of a Minor)**

**The Grand Jury Charges That:**

Between in or about April 2019 and in or about May 2019, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, RICHARD LAFRANCE a/k/a Anthony Ramos, using facilities and means of interstate and foreign commerce, that is, a cellular telephone and the internet, did knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, Victim 1, an individual who had not attained the age of 18 years and a person known to the Grand Jury, to engage in sexual activity for which any person can be charged with a criminal offense.

**All in violation of Title 18, United States Code, Section 2422(b).**

**COUNT 2**

**(Production of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about May 6, 2019, in the Western District of New York, and elsewhere, the defendant, RICHARD LAFRANCE a/k/a Anthony Ramos, having prior convictions under the laws of the State of Oregon related to aggravated sexual abuse, sexual abuse, abusive sexual contact involving a minor, and the sexual exploitation of children, did employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, a minor, that is, Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; knowing and having reason to know that such visual depiction would be transported and transmitted in and affecting interstate and foreign commerce; and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce; and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 3**  
**(Penalties for Sex Offender)**

**The Grand Jury Further Charges That:**

Between in or about April 2019 and in or about May 2019, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, RICHARD LAFRANCE a/k/a Anthony Ramos, an individual required by Federal or other law to register as a sex offender, did commit felony offenses involving a minor under Title 18, United States Code, Sections 2422(b), 2251(a), and 2251(e), that is, the felony offenses alleged in Counts 1 and 2 of this Indictment.

**All in violation of Title 18, United States Code, Section 2260A.**

DATED: Buffalo, New York, March 2, 2021.

JAMES P. KENNEDY, JR.  
United States Attorney

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A TRUE BILL:

S/FOREPERSON